

REMARKS

Reconsideration of the above-identified application is respectfully requested.

I. STATUS OF CLAIMS

By the present amendment, Applicant amends claims 1-5, 7 and 8 and adds claims 9-15. Claims 1-5, and 7-15 are currently pending in the application. In the Office Action, Claims 1-5, 7 and 8 were rejected under 35 U.S.C. § 102(a) ("Section 102(a)") as being anticipated by Final Fantasy VIII (Owners Manual for Playstation). Applicant respectfully traverses all rejections and requests reconsideration.

II. REJECTION UNDER SECTION 102(a), FINAL FANTASY VIII

As mentioned above, claims 1-5, 7 and 8 were rejected under Section 102(a) as being anticipated by Final Fantasy VIII (Owners Manual for Playstation). The Examiner has provided a declaration of his personal knowledge of Final Fantasy VIII in support of the rejections.

Final Fantasy VIII (Owners Manual for Playstation)

Final Fantasy VIII, hereinafter referred to as "FF8", offers a three dimensional Role Playing Game (RPG). FF8 has a plurality of character players and enemy characters which come into contact one scene at a time, never as a first scene and a second scene. For instance, as a character player encounters/fights with an enemy character, a first action scene takes place. When a second action scene takes place, for instance between a second player character and a second enemy character, the camera angle resets to display the encounter and the camera angle is therefore related to the command given to the second player character, NOT the first character player. Once the predetermined command is given to the first player character, only one scene is shown. The second character and second enemy stand motionless while the first action scene is displayed. When a second action scene is shown in FF8, it is then related to the command given to the second player character. (See attached Expert Kenneth Hwang Declaration)

A character in FF8 may invoke a Guardian Force (GF), which is a summons weapon of attack, however when a first character invokes the GF there is no involvement of a second player character, nor any other player character for that matter, as a result there is no second action scene. In addition, the GF force attack is displayed at numerous camera angles, each time the GF is invoked, the camera angle resets. The entire GF attack scene is based on the predetermined command given to the first player character and only involves that first player character; there is no second action scene displayed. (See Hwang Declaration).

Claims 1-5, 7-8, Final Fantasy VIII (Owners Manual for Playstation)

Claims 1, 7 and 8 recite a limitation that the claimed invention displays "a first action scene between a first player character and a first enemy character and a second action scene between a second player character and a second enemy character based on a predetermined camera angle to project said first player character and said first enemy character related to a predetermined command which is given to said first player character...and further, wherein said predetermined command is unrelated to second player character ". Claims 2-5 depend on and include all limitations of claim 1.

However, FF8 does not demonstrate, teach or suggest any of the claimed limitations of claims 1, 7 and 8. FF8 does not disclose displaying a "first action scene between a first player character and a first enemy character and a second action scene between a second player character and a second enemy character based on a predetermined camera angle to project the first player character and the first enemy character". Instead, FF8 shows what would be known as a first *phase* between character A and enemy A, and then a second *phase* between character B and enemy B, all within the same *turn*. (See Hwang declaration)

Claim 1 recites that both the "first action scene and a second action scene" are displayed based on the predetermined camera angle related to the predetermined command given to the first player character. Whereas, in FF8, phase one is displayed then phase two is displayed, and they are only displayed based on

the camera angle related to the commands given to their respective player characters, NOT on a camera angle related to the command to the first player. In fact, when phase two in FF8 is displayed, the display is based on camera angle related to a predetermined command given to the second player and is therefore RELATED to the second player. This completely contradicts the limitation in Claim 1 which recites that the display of the second action scene is based on the predetermined camera angle related to the predetermined command given to the first player, ... unrelated to the second player. In FF8, during the first action phase, the other characters/enemies are motionless while a character A is attacking enemy A (this being a scene). No other scenes are occurring or displayed during this phase, others are idling standing by (idle animation where they just bob up and down and wait). FF8 therefore does not read upon Applicant's claim 1 which recites that a second action scene is also displayed by the language: "a first action scene and a second action scene" and these scenes are displayed "based on a predetermined camera angle to project said first player character and said first enemy character related to a predetermined command which is given to said first player character". On the other hand, when a second phase is displayed in FF8, (or any phase is displayed) that is all that is displayed, there are no other action scenes between another player character and enemy character until the phase is over.

The statement in Examiner's declaration of April 3, 2003, that the "plurality of main characters attacking one or more plurality of enemy characters all with in the same scene", is not an accurate statement since each attack between a player character and an enemy character is a new scene, or more accurately a new phase in FF8, and the phases together make a turn. (See declaration of Kenneth Hwang, one of the 5 co-founders of GX Media, responsible for creating Gamers. com., having personal knowledge of FF8). Even if one were to consider the phases "scenes" in FF8, the second action phase in FF8 is NOT "based on a predetermined camera angle to project the first player character and the first enemy character", rather the second action phase in FF8 is displayed based on the predetermined

camera angle to project the second player character and the second enemy character, (in this case character B and enemy B). Moreover, such camera angle is NOT "related to a predetermined command which is given to the first player character", rather, the camera angle in the second action phase of FF8 is related to the predetermined command given to the second player character, in this case character B. As a result, the predetermined command in FF8 is inherently RELATED to the second player character whenever the second player action "scene" is displayed, and therefore does not read on the limitation in claims 1, 7 and 8 which recite that "the predetermined command is unrelated to the second player character."

The declaration of the Examiner, does not demonstrate how FF8 anticipates the limitation of claims 1, 7 and 8 for displaying the first action scene and the second action scene "based on a predetermined camera angle to project said first player character and said first enemy character related to a predetermined command which is given to said first player character... wherein said predetermined command is unrelated to second player character". Rather, in reference to any camera angle, the declaration only discusses that:

"...The plurality of characters has the option of attacking, using weapons, magic, or potions etc. or invoking Guardian Forces (GF on pages 25-26) against enemy characters. When a player invokes a GF force as part of an attack, the game reveals a sequence of lights and sounds around the main character that summons the GF force, which changes the camera's point of view to reveal the GF force at a different angle with respect to the enemy character without any involvement of the other characters. A character can attack on or more enemy characters by invoking the GF Forces...."

The applicants do not see how the invoking of GF discloses the claimed limitations of claims 1, 7 and 8. As described in the attached declaration of Kenneth Hwang, when a player in FF8 invokes a GF, there is no "second action scene". The invoking of the GF by a first character player does not result in displaying a second action scene between a second player character and second enemy character, because the GF sequence is all part of the "first scene". Therefore, there is only a

first action scene in FF8 during a GF. The display in FF8 is NOT "based on a predetermined camera angle to project the first player character and first enemy character" since the camera angle resets and changes every time the GF is invoked, and to display only a first action scene.


For these reasons, claims 1, 7 and 8 are allowable over FF8 under Section 102(a). Claims 2-5 depend on claim 1 and include claim 1's limitations. Therefore, claims 2-5 are allowable over FF8 under Section 102(a) for at least the same reasons as is claims 1, 7 and 8.

Accordingly, Applicant respectfully requests withdrawal of the rejections of Claims 1-5, 7 and 8 under Section 102(a).

The above-discussed amendments and remarks are believed to place the present Application in condition for allowance. Should the Examiner have any questions regarding the above amendments, the Examiner is requested to telephone Applicant's representative at the number listed below.

Respectfully submitted,

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